

HON. JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

VALVE CORPORATION,
Plaintiff,
v.
LEIGH ROTHSCHILD, ROTHSCHILD
BROADCAST DISTRIBUTION LLC,
DISPLAY TECHNOLOGIES,
PATENT ASSET MANAGEMENT,
MEYLER LEGAL, PLLC, AND
MEYLER,
Defendants.

Case No. 2:23-cv-1016

**DECLARATION OF KATHLEEN R.
GEYER IN SUPPORT OF PLAINTIFF
VALVE CORPORATION'S REPLY TO
ITS MOTION TO STRIKE**

**NOTE ON MOTION CALENDAR:
January 31, 2025**

Complaint Filed: 07/07/2023

ORAL ARGUMENT REQUESTED

1 I, Kathleen R. Geyer, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of Washington and
3 admitted to this Court. I am a lawyer in the law firm of Kilpatrick Townsend & Stockton LLP,
4 counsel for Plaintiff Valve Corporation in the above-referenced action.

5 2. I have personal knowledge of the facts stated in this declaration and, if called upon
6 to do so, I could and would competently testify thereto.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of correspondence sent by
8 counsel for Valve to counsel for Defendants dated October 16, 2024

9 4. Attached hereto as **Exhibit 2** is a true and correct copy of an email chain between
10 counsel for Valve and counsel for Defendants with the subject “RE: Valve v. Rothschild, et al. -
11 Letter Regarding Defendants’ Discovery Deficiencies,” with a date range between October 16 and
12 November 26, 2024.

13 5. Attached hereto as **Exhibit 3** is a true and correct copy of correspondence sent by
14 counsel for Valve to counsel for Defendants, dated December 20, 2024.

15 6. Attached hereto as **Exhibit 4** is a true and correct copy of an email sent by counsel
16 for Valve to counsel for Defendants, dated January 29, 2025.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.

19 Executed on January 30, 2025 at Seattle, Washington.

20 */s/ Kathleen R. Geyer*
21 Kathleen R. Geyer